*DOE/ID-11008*
*Rev. 1*

U.S. Department of Energy
Idaho Operations Office

# INL-Site Idaho Completion Project Long-Term Stewardship Strategic Plan

September 2007

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# Idaho Cleanup Project

DOE/ID-11008
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# INL Site Idaho Completion Project
# Long-Term Stewardship Strategic Plan

**September 2007**

**Prepared for the**
**U.S. Department of Energy**
**Idaho Operations Office**

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# ACRONYMS

| | |
|---|---|
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| DOE | U.S. Department of Energy |
| DOE-ID | U.S. Department of Energy Idaho Operations Office |
| EM | Environmental Management |
| FFA/CO | Federal Facility Agreement and Consent Order |
| ICP | Idaho Cleanup Project |
| INL | Idaho National Laboratory (site operating under the aegis of DOE-ID) |
| RCRA | Resource Conservation and Recovery Act |
| WAG | Waste Area Group |

# DEFINITIONS

*Agencies*: Idaho Department of Environmental Quality (DEQ), Environmental Protection Agency (EPA), and Department of Energy Idaho Operations Office (DOE-ID)

*ARAR (Applicable or Relevant and Appropriate Requirements): applicable to CERCLA cleanup activities, the ARAR process requires CERCLA projects to consider and either meet or waive certain federal and state laws and regulations and non-governmental requirements, based on the exigencies of the situation.*

*CERCLA (Comprehensive Environmental Response, Compensation and Liability Act):* the federal law that establishes a program to identify, evaluate, and remediate sites where hazardous substances may have been released (leaked, spilled, or dumped) to the environment.

*Engineering Controls:* controls that require engineering support for implementation: such as groundwater monitoring, ongoing water diversion or pump and treat activities, cap repair, maintenance of entombed buildings, containment structures, facilities, or barriers.

*Federal Facility Agreement and Consent Order (FFA/CO):* an agreement between the Department of Energy (DOE), Environmental Protection Agency (EPA), and the State of Idaho to evaluate potentially contaminated sites at the Idaho National Laboratory (INL), determine if remediation is warranted, and, if necessary, select and perform remediation.

*Groundwater:* water that soaks into the ground and percolates downward through rock or soil pores until it is stopped by an impermeable layer. Natural sources are rain fall, snowmelt, and water that seeps into the ground beneath streams, rivers and lakes. Other sources can include irrigated fields, canals, wastewater drain fields, injection wells, leaking pipes, and industrial cooling ponds.

*Hazardous waste*: Waste that is regulated under Resource Conservation and Recovery Act (RCRA) Subtitle C. A solid waste or combination of solid wastes that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may cause or significantly contribute to an increase in mortality or an increase in serious, irreversible, or incapacitating reversible illness; or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

*Institutional controls: c*ontrols such as deed restrictions, use restrictions, and permitting requirements that prohibit or limit activities that may result in exposure to contamination. Effective institutional controls must remain in effect for the duration of the hazard, survive a change in property ownership, and be enforceable. Institutional controls also include those which preserve knowledge and facilitate public education regarding hazards at a site in order to enhance protectiveness into the future.

*Resource Conservation and Recovery Act (RCRA):* a federal waste management law. Its guidelines regulate transportation, treatment, storage, and disposal of waste. RCRA waste includes material that is listed on one of the Environmental Protection Agency's (EPA) hazardous waste lists or meets one or more of EPA's four characteristics of ignitability, corrositivity, reactivity, or toxicity.

*Record of Decision (ROD):* a public document that explains which remedies will be used at a site and why. The Responsiveness Summary contains the public comments received on the proposed actions and the Agencies' responses.

*Remedial Investigation/Feasibility Studies (RI/FS):* a study that identifies which contaminants are present in an area, assesses the risk they pose to human health and the environment, and evaluates remedial options.

*Remediation:* the process of cleaning up a site where a hazardous or radioactive substance has been released.

*Site controls:* engineering and institutional controls.

*Surveillance and maintenance: a*ll activities necessary to ensure protection of human health and the environment following completion of cleanup, disposal, or stabilization at a site or portion of a site, including the perpetuation of all site controls, inspections, and record-keeping.

# INL-Site Idaho Completion Project
# Long-Term Stewardship Strategic Plan

## 1. INTRODUCTION AND PURPOSE

Idaho National Laboratory (INL; formerly the Idaho National Engineering and Environmental Laboratory [INEEL]) projects supporting Cold War activities over the last 50 years have led to the release of hazardous and radioactive contaminants into the air, groundwater, and soils of the INL Site. But despite efforts by the Department of Energy (DOE) to clean affected areas to reduce inherent risks, factors such as technical infeasibility, risk to workers or the environment, programmatic priorities, or cost have prevented remediation of all contaminated sites to their pristine conditions.

Sites that cannot be returned to pristine condition during remediation are subject to long-term stewardship, and require ongoing monitoring and maintenance to ensure the protection of human health and the environment. Several areas at the INL Site have undergone remedial action. These areas, depending on input from the State of Idaho, the Environmental Protection Agency (EPA), and public stakeholders, are scheduled to have engineering and institutional controls and limited access for approximately 100 years.

The primary driver for long-term stewardship at the INL Site is the Idaho Cleanup Project (ICP) contract[1] which calls for nearly site-wide implementation of institutional and engineered controls, reporting, five-year reviews, management of the administrative record, and the completion of sitewide Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)/Federal Facility Agreement and Consent Order (FFA/CO) and Legacy Management (the DOE's current incarnation of long-term stewardship) actions.

This Strategic Plan provides a brief historical overview of ICP long-term stewardship at the INL Site and the major goals and strategies that will drive the continued implementation of long-term stewardship in the future. The specific activities and processes that will be required to implement these goals should be outlined within an implementation plan and within implementing procedures and work plans.

## 2. LONG-TERM STEWARDSHIP VISION AND MISSION

The vision and mission for the ICP long-term stewardship are:

- Vision—to ensure the safe, informed, and judicious use of the INL Site by multiple generations following remediation.

- Mission—to ensure the safe, informed, and judicious use of the INL Site by multiple generations following remediation through decisions and actions that (1) protect human health and the environment from residual contamination, (2) conserve ecological and cultural resources, and (3) respond to regulatory, political, and technological changes.

## 3. BACKGROUND

The information presented in this section provides salient national, regional, and local historical events that are of significance in the evolution of long-term stewardship at the INL Site.

Nationwide, DOE controls roughly 2.3 million acres of land and 120 million square feet of building structures. At the INL Site, roughly 25% (570,000 acres) of this total had been acquired through a combination of purchases and Public Land Orders (PLO-318, PLO-545, PLO-637, PLO-1770).[2 3 4 5] DOE withdrew these lands from the public to the governmental domain without time limitation or scheduled expiration. The potential future return of these lands to the public will require compliance with existing and future regulations for federal lands transfer.

In response to expanding public environmental concerns, Congress adopted Superfund legislation[6] in December 1980, providing a mechanism to identify, prioritize, and enforce the remediation of contaminated sites throughout the country.

In 1989, two significant events affected the management of contaminated areas within the INL Site. The first event was the creation of the U.S. Department of Energy Office of Environmental Management. The second event was the addition of the INL Site to the EPA Superfund National Priorities List, requiring DOE to enter into a FFA/CO with the EPA and the State of Idaho for effective management of the INL Site. The INL Site FFA/CO was signed December 4, 1991.[7]

The FFA/CO also superseded the Resource Conservation and Recovery Act (RCRA) 3008(h) Consent Order and Compliance Agreement that had been executed on July 10, 1987, effectively moving responsibility for investigation and cleanup of releases at the INL Site from RCRA to CERCLA.

The consummation of the FFA/CO in 1991 had additional consequences. For instance, for management efficiency, it divided the INL into waste area groups (WAGs). WAGs 1 through 9 generally corresponded to INL Site operational facilities, while WAG 10 corresponded to overall concerns associated with the Snake River Plain Aquifer, plus those surface and subsurface areas that were not included within the bounds of the facility-specific WAGs (see Figure 1). Each potential source-area within each WAG was additionally categorized as a unique operable unit for investigation and remediation.

The FFA/CO also defined a lead-agency approach to agency oversight of contractor environmental activities. Under this approach, DOE is considered the lead agency with respect to overall implementation of the FFA/CO agreement, while the Idaho Department of Health and Welfare was designated as the lead agency for WAG 7 (Radioactive Waste Management Complex), and EPA was designated as the lead agency for all other INL Site WAGs. The Idaho Department of Environmental Quality (DEQ) has subsequently been designated the responsible agency for the state of Idaho.

The FFA/CO required that the Agencies agree to an action plan (Attachment A of the FFA/CO), and select project managers as points-of-contact to oversee the activities of each WAG. Contractors were also required to select WAG managers to ensure remediation complied with the approved action plan. The FFA/CO essentially established roles and authorities governing the INL Site CERCLA activities in perpetuity.

Although the FFA/CO agreement established a reporting hierarchy and specified important elements of CERCLA cleanup, it made no specific reference to long-term stewardship—a term that would be subsequently coined by DOE in the mid 1990s.

In January 2000, DOE directed all sites where Environmental Management (EM) was the landlord to submit long-term stewardship plans to DOE Headquarters and incorporate them into baseline summary funding documents. At that point, the Department of Energy Idaho Operation Office (DOE-ID) committed to write a long-term stewardship plan and establish a long-term stewardship program.

On a local level, with the creation of the long-term stewardship group in 2001, CERCLA stewardship for the majority of the INL Site was consolidated into a single organization, but with individual WAGs retaining responsibility for administration of long-term stewardship at some sites.

In October 2002, the INL Site published its *INEEL Long-Term Stewardship Strategic Plan*,[8] followed by the *INEEL Long-Term Stewardship Implementation Plan*[9] in September 2003.

On May 1 2005, the DOE contracted with CWI for management of the Idaho Completion Project. The purpose of the contract was to "safely accomplish as much of EM's cleanup mission as possible within available funding while meeting regulatory requirements through the contract completion date."[10] The contract requires among other things the completion by September 30, 2012, of the following:

- Continue CERCLA remedial pump and treat activities (OU-1-07B).
- Perform actions necessary to complete (the requirements within)… RODs.
- Achieve end states that provide the lowest risk and cost and the fewest post-closure activities as possible.
- Isolate contamination from the environment through the use of passive measures that minimize future cleanup liabilities and respond to releases and events swiftly and effectively.
- Challenge existing work plans and pursue safe, aggressive and efficient alternatives to achieve equivalent cleanup and risk reduction faster and at less cost. Eliminate non risk-reduction activities.
- Comply with all applicable site environmental permits and compliance documents.
- Negotiate, subject to DOE approval, with regulatory Agencies.
- Be responsible for coordinating compliance with site-wide level requirements under the RCRA and Idaho Hazardous Waste Management Act, including the Voluntary Consent Order and the CERCLA under the FFA/CO.
- Develop and implement a graded approach to maintenance commensurate with the facility condition, mission need, and schedule for demolition.
- Complete all five-year reviews that occur during the contract term in the geographic areas assigned… including the Idaho Nuclear Technology and Engineering Center (INTEC), Test Reactor Area (TRA; now Reactor Technology Complex [RTC]), Test Area North (TAN), Power Burst Facility (PBF), Radioactive Waste Management Complex (RWMC), and Miscellaneous Sites (including the Central Facilities Area [CFA]).
- Maintain all records required to determine the source, remediation, and current status of all site contamination including areas not under their control, such as the Naval Reactors Facility (NRF) and the Argonne National Laboratory-West (now MFC).
- Continue site-wide ecological monitoring in accordance with the Long-Term Ecological Monitoring Plan for the INEEL,[11] or propose alternative methods for achieving ROD requirements.

- Provide a records management program, including the maintenance, storage, protection and disposition of active and inactive records, retrieval from on-site storage facilities, and support for ongoing discovery efforts associated with litigation.

- Ensure institutional and engineered controls are in place and functioning in a manner consistent with applicable regulatory requirements.

In July 2006, the INL Site revised its *Long-Term Stewardship Implementation Plan*, providing an updated list of CERCLA long-term stewardship requirements with planned and completed implementation goals.

The current state of long-term stewardship implementation at the INL Site is flavored by many issues, including national, state, and local issues, and in particular the issues and requirements of the current ICP contract. This strategic plan is being updated at the request of DOE-ID to accommodate those issues currently deemed essential to the performance of long-term stewardship at the INL site.

# 4. DEFINITION OF LONG-TERM STEWARDSHIP

This strategic plan adopts the basic definition of long-term stewardship presented in "A Report to Congress on Long-Term Stewardship."[12]

> "… long-term stewardship refers to all activities necessary to ensure protection of human health and the environment following completion of remediation, disposal, or stabilization of a site or a portion of a site. Long-term stewardship includes all engineered and institutional controls designed to contain or to prevent exposures to residual contamination and waste, such as surveillance activities, record-keeping activities, inspections, groundwater monitoring, ongoing pump and treat activities, cap repair, maintenance of entombed buildings or facilities, maintenance of other barriers and containment structures, access control, and the posting of signs."

Long-term stewardship does not include CERCLA remedial investigations, feasibility studies, remedy selections, remedial design, remedial actions, Hazardous Waste Management Act (HWMA)/RCRA corrective actions, closure processes, or post-closure permits. If required, however, these activities must be completed for each site before its administration can be transferred to the long-term stewardship organization.

# 5. STATUS OF LONG-TERM STEWARDSHIP AT THE INL SITE

There are two ways sites typically become subject to long-term stewardship requirements. The first is when a site has been remediated and its remedial action objectives are completed, or when its remedy is operating at steady-state (for instance, for a groundwater pump and treat facility). The second is when a site is newly identified as a No Further Action site, not requiring remediation, but requiring ongoing operations and maintenance or the use of institutional controls.

As of January 1, 2007, there have been 683 CERCLA sites identified at the INL (including non-ICP sites) and categorized according to status, action level, and requirements for ongoing long-term stewardship. Of these sites, 94 will require ongoing long-term stewardship (see Table 1).

Table 1. Sites that require long-term stewardship.

| Status | Action Level | On-going Institutional Controls required? | Number of Sites | Percentage of all Sites | Percentage of all Sites |
|---|---|---|---|---|---|
| Completed Sites | No Action | No | 447 | 65% | 79% |
| | No Further Action | Yes | 94 | 14% | |
| Not Completed Sites | In process | Yet unknown | 142 | 21% | 21% |
| Total Sites | | | 683 | 100% | 100% |

Although 94 sites currently have long-term stewardship requirements, approximately 30 of the remaining not completed sites could become long-term stewardship sites upon completion of the agency review (when considered completed). This would leave approximately 124 sites requiring on-going institutional controls at that time.

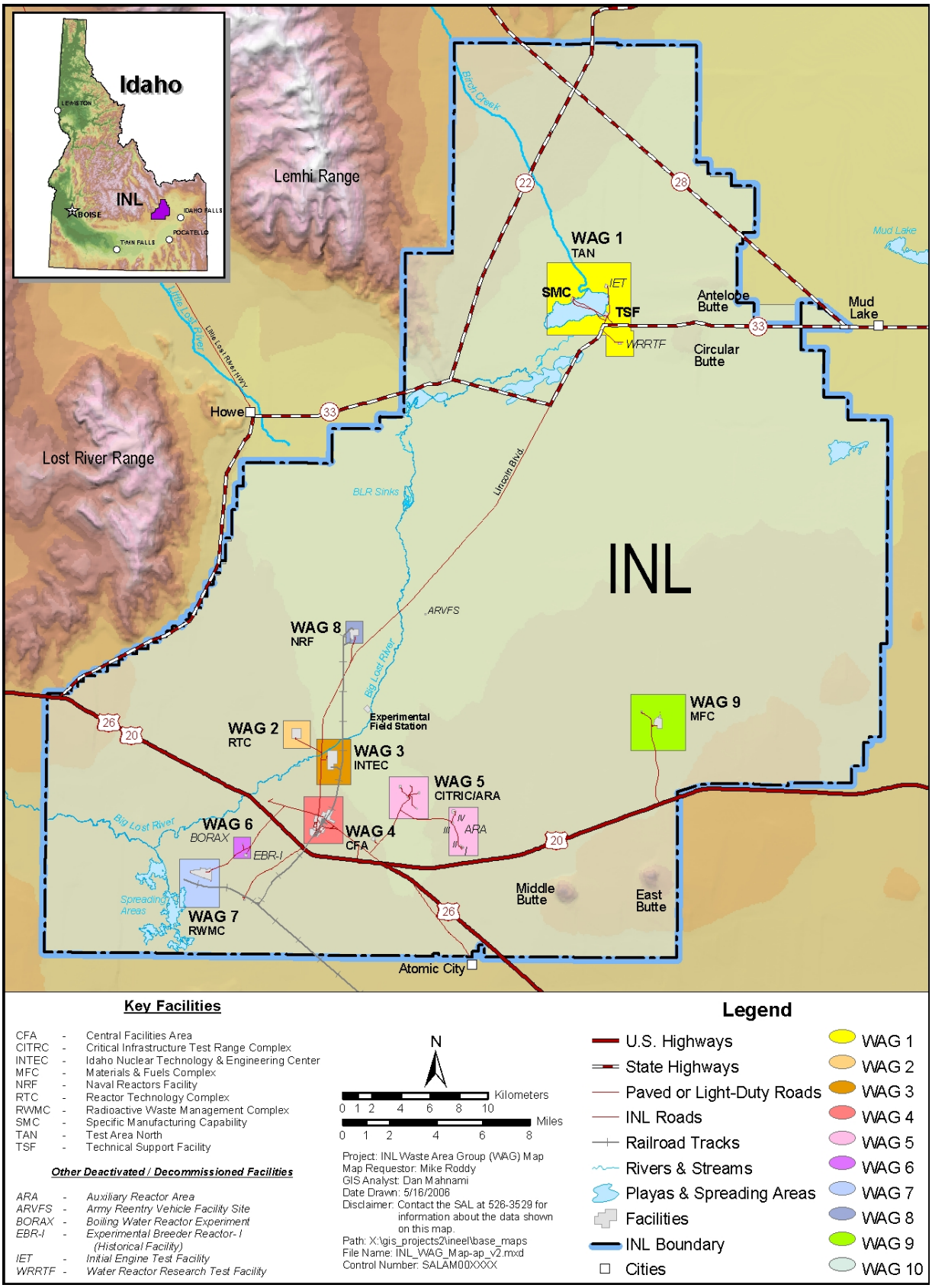


Figure 1. INL major facilities and WAGs.

# 6. LONG-TERM STEWARDSHIP VIABILITY

Assumptions about the future of long-term stewardship viability include:

- DOE-ID will continue to manage the INL Site for the foreseeable future.
- Terms and conditions of the ICP contract DE-AC07-05ID14516 and the FFA/CO will continue to govern long-term stewardship activities at the INL Site.
- Adequate support of and funding for long-term stewardship activities will be provided by DOE.
- As contaminated sites are remediated and new sites are identified, there will be an increase in the number of INL sites requiring site controls.
- The electronic preservation of reliable and retrievable environmental data is requisite to making enlightened future land-use decisions.
- Consolidating the administration of long-term stewardship activities is more cost effective than having individual projects manage those activities independently.
- Long-term stewardship status and activities must be clearly identified and quantified to allow for future transition (potential changes in personnel, landlord, funding source, or site mission).

# 7. GOALS AND IMPLEMENTING OBJECTIVES FOR IDAHO COMPLETION PROJECT LONG-TERM STEWARDSHIP

The following goals and strategic objectives establish the extent and limits of the ICP long-term stewardship program. As the program refines its planning for long-term stewardship activities, the listed goals and objectives may need to be modified.

## Goal 1: Implement Primary Long-Term Stewardship Requirements

### Strategic Objective 1.1—Identify and incorporate primary requirements.

Primary requirements are those that directly accomplish long-term stewardship goals (such as implementation of site controls) at a site. They include the requirements identified during remediation planning such as those documented within Records of Decision (RODs), Explanation of Significant Differences (ESDs), Remedial Action reports, and Work Plans, or as negotiated with the Agencies during new-site-identification processes.

The revised National Contingency Plan of 1990 requires compliance with applicable or relevant and appropriate requirements (ARAR) during remedial actions … (and) at completion, and compels the attainment of ARARs during removal actions to the extent practicable, considering the exigencies of the situation.[13] The INL-Site process of primary requirements development provides for ARAR evaluations of federal and state law. In keeping with the minimization of administrative effort within CERCLA, only those laws deemed applicable or relevant and appropriate (i.e., those laws that have not been waived) will be enumerated within remediation planning documents.

All primary requirements must be incorporated within implementing documents, procedures, and work plans.

## Goal 2: Manage Residual Risk

### Strategic Objective 2.1—Process New Site identifications in a timely manner.

New-site identifications are performed by the long-term stewardship organization, typically following the initial discovery of a new site. The ICP contract enumerates the issue as follows: "The contractor shall complete any follow-on remedial actions resulting from five-year reviews through the contract period."[14] New site identifications require research, internal review and recommendation, agency review and approval, and site categorization and action.

### Strategic Objective 2.2—Conduct surveillance and maintenance activities as required.

Surveillance and maintenance is s major part of long-term stewardship. By contract, the ICP must "ensure institutional and engineered controls are in place and functioning in a manner consistent with applicable regulatory requirements."[1516] But because each site is singular, its required surveillance and maintenance may be unique. The INL Site has at least one site tentatively requiring surveillance and maintenance for 100 years.

### Strategic Objective 2.3—Report the status of long-term stewardship as required.

Reports that will be required include periodic institutional controls and operations and maintenance reports, five-year review reports, and other ad hoc reports dictated within remedy decisions or by the Agencies. Periodic reports should verify compliance with primary requirements.[17]

## Goal 3: Implement Secondary Long-Term Stewardship Requirements

### Strategic Objective 3.1—Comply with federal environmental statutes, regulations, and executive orders, as well as DOE orders and policy directives.[18]

The work of long-term stewardship nationwide is affected directly and indirectly by requirements from multiple sources. The DOE Office of Environmental Management has compiled a web-page entitled "Law and Policy," which lists important long-term stewardship requirements.[19]

From the Executive and Legislative branches of the federal government, a list of relevant statutes, regulations, and executive orders pertaining to long-term stewardship has been compiled.[20] In addition to the major environmental statutes, the list provides guidance in the following areas: nuclear operations; non-hazardous, hazardous, and radioactive waste operations; DOE transfer or leasing of real property; environmental preservation and reporting; the need for intergovernmental cooperation; preservation of archaeological, cultural, and historical resources; Indian-Trust requirements; wildlife preservation and conservation; mining requirements; regulation of wilderness areas; clean air; clean water; and personnel safety.

Likewise, a list of long-term stewardship relevant DOE orders and policy directives has been compiled.[21] Issues addressed include: transition of long-term stewardship to site landlords, general long-term stewardship responsibilities, Tribal issues, cultural resources management, safety, land and facility-use policy, health and safety, the environment, public participation, comprehensive emergency management, information management, performance analysis, program and project management, life cycle management, radioactive waste management, National Environmental Policy Act compliance, security and emergency-management independent-oversight, site development planning, real property management, capital asset management, maintenance management, radiation protection, conduct of operations, cost estimating, and self assessment of closeout activities.

Secondary long-term stewardship requirements are, like primary long-term stewardship requirements, subject to ARAR evaluation and documentation within long-term stewardship implementing procedures and work plans.

### Strategic Objective 3.2—Support sitewide fire fighting and disaster mitigation efforts.

From 1994 to 2000, some 130,000 acres of the INL Site and several hundred thousand acres of surrounding Bureau of Land Management lands burned. Fires threatened operational facilities, exposed soils to wind erosion, and resulted in severe dust storms, creating traffic hazards and affecting Site operations for weeks.

In the event of future fires or other disasters affecting CERCLA sites at the INL, emergency management of the situation will proceed according to the INL contractors "INL Emergency Plan/RCRA Contingency Plan,"[22] with the activation of Emergency Control Centers in the field staffed by individuals from the sitewide Emergency Response Organization (ERO), with activation of the centrally located Emergency Operations Center, and with on-the-ground-support by appropriate first-responder groups.

### Strategic Objective 3.3—Support cultural resources management efforts.

The INL Site is home to a wide variety of important cultural resources representing the entire ±12,000-year span of human occupation of Southeastern Idaho. These resources, such as the Aviator's Cave and other native and early-American locations and artifacts, are non-renewable, bear valuable physical and intangible legacies, and yield important information about the past. There are, however, special challenges associated with balancing the preservation of these sites against the management and ongoing operations of an active scientific laboratory.

Consequently, the management of cultural resources at the INL Site must comply with the requirements of the "Cultural Resource Management Plan,"[23] under the direction of the BEA Ecological Sciences organization.

### Strategic Objective 3.4—Support ecological resources management.[24]

The INL Site consists of roughly 890 square miles of high dessert terrain, providing unique habitat for its very diverse plant and animal populations, none of which is threatened as endangered at the present time.

Major goals of INL Site ecological efforts include: (1) to verify that the objectives of each remedial action are maintained, and (2) to determine that contamination left in place is within acceptable limits.[25] Ecological activities at the INL Site are divided among several sitewide and contractor organizations, each responsible for their portion of the overall ecological monitoring effort.

### Strategic Objective 3.5—Support stakeholder communications.

The ICP External Communications group is currently responsible for all off-site communications with the public and stakeholders, although long-term stewardship personnel support these efforts as requested. An agreement between the Shoshone-Bannock Tribes and DOE establishes joint interaction protocols and expectations relative to long-term stewardship at the INL Site.[26] In addition, a public involvement plan has been written that provides guidelines for public involvement in long-term stewardship issues.[27]

# Goal 4: Information Management

### Strategic Objective 4.1—Provide state-of-the-art information-management that complies with MCP-557, "Records Management."

The areas of records management and data collection, qualification, and storage comprise a very important aspect of environmental monitoring and long-term stewardship. The ability to effect future program transition or make land-use decisions will strongly depend on the quality and accessibility of records and data.

Long-term stewardship records (documents, papers, maps, photographs, electronic files, microform, or notes that document an organization's functions, policies, decisions, procedures, and essential transactions, including all significant decisions and commitments reached orally), must be stored in a unique manner, per MCP-557, "Records Management."

Long-term stewardship non-records (informational material not meeting the definition of a record, and intended solely for reference or exhibit) which need to be stored electronically will be stored within one of several configuration-controlled databases. The following databases are available as appropriate to project managers interested in preserving electronic informational-data.

- The Environmental Data Warehouse is an Oracle database, currently under the auspices of the ICP, that has been designated as the official warehouse for long-term management and storage of INL Site cleanup data.[28] [29] When accessing this on-line database, users have the ability to flexibly query analytical and other forms of data supporting environmental or other projects sitewide. The Environmental Data Warehouse is a configuration-controlled system, thus ensuring its data is safely maintained and retrievable.

- The Long-Term Stewardship Tracking System was developed to provide a remediation summary status of each CERCLA site, from initiation to completion. This database is beneficial to project or program managers, work managers, and regulators alike—anyone who may be interested in the reviewing the unofficial status of site remediation activities. The tracking system was originally developed in Access but has been transitioned to Oracle for configuration control and internet access. The tracking system is scheduled for release in 2007.

- The Institutional Controls Sites database (formerly the Comprehensive Facility & Land Use Plan [CFLUP] database) is also accessed on-line.[30] It provides CERCLA site-specific information about contamination sites, buildings, and structures located at the INL. For example, after selecting a specific site within a WAG, a typical user is able to access for-reference-only site descriptions, locations, elevations, maps, pictures, lists of land use restrictions, institutional controls, contaminants, and use control objectives.[31]

With the Environmental Data Warehouse, Long-Term Stewardship Tracking System, and the Institutional Controls Sites databases in operation, configuration controlled tools are now available to assist data managers to safely preserve and readily access their reference environmental and operational data.

## Goal 5: Prepare for Eventual Long-Term Stewardship Program Transition

### Strategic Objective 5.1—Institutionalize long-term stewardship activities to be independent of personnel changes, INL Site workscope, or cognizant site contractors.

While environmental managers cannot anticipate the political or economic factors affecting the disposition of long-term stewardship over time, they can attempt to consistently streamline and improve the tools required for long-term stewardship. For instance, the recent development of the Long-Term Stewardship Tracking System now allows environmental data to be queried by potential users without requiring the assistance of a database administrator. Other improvements capable of making long-term stewardship less dependent on individuals should be pursued.

### Strategic Objective 5.2—Track long-term stewardship costs by defined functional areas.

The cost of conducting Long-Term Stewardship is an important benchmark that should be tracked on a yearly basis to assist in planning future programmatic activities. Beginning in May 2005, long-term stewardship expenditures have been tracked in seven control accounts: P.4.C1.01 to 06 and W.1.08.01. Control account details are further designated within work packages dealing with soils, ecological monitoring, management, the Environmental Data Warehouse, Test Area North in situ bioremediation, sitewide program administration, institutional-controls operations, five-year reviews, operations and maintenance, groundwater, OU 10-08 annual RI/FS, and geographic information systems (GIS).

### Strategic Objective 5.3—Continue a move toward consolidation of long-term stewardship activities into a single sitewide organization.

The ICP contract states: "The INL must function as a single site for many regulatory purposes. Therefore, a sitewide coordination and integration function is necessary. The (ICP) contractor shall be responsible for coordinating compliance with sitewide level requirements under the RCRA and Idaho Hazardous Waste Management Act, including the Voluntary Consent Order and the CERCLA under the FFA/CO."[32]

Program transition to a single sitewide organization is preparatory to potential future program transition to a different site contractor or governmental agency.

### Strategic Objective 5.4—Document changes in proprietorship and confirmation of requirements-compliance at each transition of site ownership.

This objective is to provide a permanent electronic record characterizing each site transition. The record should include a completed checklist, the date of site transition, and the names of both parties to the transition, confirming that both have verified the satisfactory implementation of each site's primary requirements.

# 8. SUMMARY

This Strategic Plan provides a brief overview of long-term stewardship at the INL Site and the major goals and strategies that will drive the implementation of long-term stewardship in the future according to changing local and national needs. The specific activities and processes that will be required to implement these goals should be outlined within an implementation plan and within implementing procedures and work plans.

As cleanup accelerates, sites will continue to be transferred from remediation to stewardship, surveillance and maintenance will be conducted, implementing and environmental data and reports will be managed, and program costs will be tracked in a manner intended to ensure the safe, informed, and judicious use of the INL Site by multiple generations following remediation

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